

WIA Reauthorization Forum on One-Stop Services to Persons with Disabilities: Summary of Participant Comments

July 15, 2002

BACKGROUND

Purpose of the Forum

The Workforce Investment Act of 1998 (WIA) provides the framework for a national workforce preparation and employment system designed to meet the needs of the Nation's business community, job seekers and those who want to further their careers. Key components of the Act include enabling customers to easily access the information and employment and training services they need through the One-Stop system and empowering adults to obtain the training they find most appropriate through Individual Training Accounts.

Congress is scheduled to take up the reauthorization of WIA in 2003. In anticipation of reauthorization, several Federal agencies partnered to host a Public Forum to begin gathering input on what changes should be made to WIA to best meet the needs of persons with disabilities in the workforce investment system.

Overview

The Forum was held June 21, 2002 at the Ronald Reagan Building and International Trade Center in Washington, DC. A total of 108 participants attended the Forum and 28 participants made comments.

The following Federal agency representatives were present as listeners at the Forum:

U.S. Department of Labor:

- Emily Stover DeRocco, Assistant Secretary, Employment and Training Administration
- William J. Mea, Deputy Assistant Secretary for Policy, Office of Disability Employment Policy
- Annabelle T. Lockhart, Director, Civil Rights Center, Office of the Assistant Secretary for Administration and Management, U.S. Department of Labor
- Mason Bishop, Special Advisor to the Assistant Secretary, Employment and Training Administration

U.S. Department of Education:

- Joanne Wilson, Commissioner, Rehabilitation Services Administration, Office of Special Education and Rehabilitative Services

- Loretta Chittum, Deputy Assistant Secretary, Office of Special Education and Rehabilitative Services
- Stephanie Lee, Director, Office of Special Education Programs, Office of Special Education and Rehabilitative Services

U.S. Department of Health and Human Services:

- Don Winstead, Deputy Assistant Secretary for Human Services Policy, Office of the Assistant Secretary for Planning and Evaluation
- Thomas Hamilton, Director of the Disabled and Elderly Health Programs Group, Centers for Medicaid and Medicare Services

Social Security Administration

- Ken McGill, Associate Commissioner for Employment Support Programs

Comment Topics

This document summarizes the comments made by the participants who spoke at this Forum. Speakers are identified here by their role within the One-Stop system.

A Discussion Guide on One-Stop Services to Persons with Disabilities was made available before the Forum. The Discussion Guide encouraged speakers to address one or more of the six following issues:

- State and Local Governance
- One-Stop Accessibility
- Service Coordination
- Provision of Training Services
- Performance Measurement
- Youth Activities

The summary of comments in this section first presents issues raised on the six topics included in the discussion guide. Following these are two additional sections for topics not specifically raised in the discussion guide:

- Support or Recommended Changes for Specific Programs
- Other Topics

COMMENTS

1. State and Local Governance

The Discussion Guide on One-Stop Services to Persons with Disabilities encouraged Forum participants to share their ideas for increasing the participation of persons with disabilities in the governance and policymaking of the workforce investment system. This section summarizes Forum speaker comments relating to governance of the One-Stop system. Most of the comments on governance concerned representation on State and Local Workforce Investment Boards (WIBs). The comments have been clustered by topic as follows:

- Vocational Rehabilitation Agency Representation on WIBs
- Representation of Community-Based Disability Organizations on WIBs
- WIB Representation for Individuals with Disabilities
- WIB Collaboration with Disability Organizations
- Involvement of Business Leadership Networks

1.1 Vocational Rehabilitation (VR) Agency Representation on WIBs

- We strongly suggest (as we did for the original WIA legislation) that VR Directors, both in the general agencies, and where applicable the blind agencies, fully participate in State Workforce Investment Boards (SWIBs). *One-Stop Partner: Vocational Rehabilitation*
- There was very little representation on WIBs for persons with disabilities except VR Directors, who had political obligation not to make services accessible. *Consumer/Customer Organization*

1.2 Representation of Community-Based Disability Organizations on WIBs

- Have disability groups represented on WIBs. County commissioners don't respond to our grassroots campaigns. Many current WIB members are more concerned with county commissioner politics. *Consumer/Customer Organization*
- WIA reauthorization ought to mandate the involvement of Centers for Independent Living (CILs) on WIBs. Currently, the Workforce Incentive Grant is my center's only involvement with WIA. CILs share common philosophy of consumer choice and consumer control. The best way to involve persons with disabilities in getting employment is to involve them in system governance. CIL governing boards and staff are mandated by law to have persons with disabilities in the majority. Although we are pleased that VR is a mandated partner, if participation by persons with disabilities is desirable, it makes sense to involve grassroots, local groups—there are currently over 300 of these centers funded by the Federal government. *Disability Service Provider*

- Require that not just VR, but community-based disability service providers be represented on WIBs at state and local level. *Disability Service Provider*

1.3 WIB Representation for Individuals with Disabilities

- Require every Workforce Board to include two members with disabilities and a task force or subcommittee that is empowered to address disability issues. *State One-Stop Partner: Vocational Education*

1.4 WIB Collaboration with Disability Organizations

- WIBs and One-Stops don't recognize community-based experience. Disability service providers have expertise and creativity and could be part of the solution. *National Association: Disability Service Providers*
- DOL grants need to be made to organizations that specialize in serving persons with disabilities. Current grants require Local Workforce Investment Boards (LWIBs) to be the primary recipient, and many LWIBs are not interested in partnering with disability organizations. *One-Stop Partner: Projects With Industry (RSA)*
- In many communities, WIBs are not interested in disability expertise and experience and we need to change that. *National Association: Disability Service Providers*
- WIA should strengthen relationships with community employment providers in regards to services for individuals with mental retardation and other disabilities. *National Association: Disability Service Providers*
- State Workforce Development Agencies must provide assurances to the U.S. Department of Labor that the provision to involve community-based organizations is being met. *National Association: Disability Service Providers*

1.5 Involvement of Business Leadership Networks

- Incorporate Business Leadership Networks (BLNs) into One-Stops to increase the involvement of employers who will potentially hire job-seekers with disabilities. *Rehabilitation Research and Training Center*
- One person from the Business Leadership Network (BLN) should be required to be on the WIB. *Disability Service Provider*

2. One-Stop Accessibility

WIA Section 188 requires all One-Stop Centers and affiliated sites to provide physical, communication, and program access for persons with disabilities. This section summarizes Forum speaker comments relating to the accessibility of One-Stop Centers and services. The comments are clustered by topic as follows:

- General Comments on Accessibility
- Physical and Communication Access
- Program Access
- Staff
- Accessibility Issues Regarding Specific Disabilities, Populations, or Services
- Customer Rights
- “Best Practices” in Accessibility
- Resources for Accessibility
- Workplace Accessibility

2.1 General Comments on Accessibility

- The most common barriers to receiving services at One-Stops have to do with accessibility.
Consumer/Customer Organization
- It is very difficult for persons with disabilities to access services in my state.
Consumer/Customer Organization
- Regulations from the WIBs in my state did not reference the Americans with Disabilities Act. *Consumer/Customer Organization*
- One-Stop Centers must comply with ADA, by providing both physical and programmatic access, including communicative, cognitive, and sensory disabilities. This includes alternative formats (such as Braille and large print), auxiliary services (such as interpretation), and assistive technology and accessible software and computer equipment.
One-Stop Partner: Vocational Rehabilitation
- The workforce investment system must be inclusive of all individuals with disabilities.
National Association: Disability Service Providers

2.2 Physical and Communication Access

Physical Access

- Because of our Work Incentive Grant, our One-Stops are far ahead of our state’s other areas in improving physical access. We audited all our centers and provide assistive technology.

Physical access is almost the easiest thing to improve in One-Stops. Work Incentive Grant funds have provided the push to make it happen. *One-Stop Center Staff*

- In my state's One-Stop system, new buildings were being built and accredited without accessibility. *Consumer/Customer Organization*
- All One-Stops must be physically accessible to individuals with disabilities. *National Association: Disability Service Providers*

Communication Access

- Simple accommodations are lacking. There is not even extra space by the phones for TTY equipment for deaf or hard-of-hearing persons. *Consumer/Customer Organization*
- There is not enough computer adaptation and alternate formats. *Disability Service Provider*

2.3 Program Access

- While progress has been made in physical accessibility, state VR agencies are concerned with the lack of program accessibility in One-Stops. Reasons for the lack of program access are funding, lack of staff knowledge, and the belief that this is the responsibility of VR alone. *One-Stop Partner: Vocational Rehabilitation*
- Regulatory and implementation barriers exist for persons with high support needs, even in new programs like Ticket to Work. *National Association: Consumers/Customers and Disability Service Providers*
- You need to provide the same access points for people with disabilities that are there for everyone else. *Consumer/Customer Organization*
- We are encouraging members to work with One-Stops to get core services and training needed for our more complex job opportunities. But around the country there is inconsistent accessibility of programs. Many One-Stops think they have no legal mandate to serve persons with disabilities. *Disability Service Provider*
- System partners must be constantly reminded of their responsibilities to provide access to their facilities and programs. For example:
 - The usworkforce.org website is generally an excellent resource, but it has little indication that persons with disabilities are integrated into the system.
 - At Workforce Innovation 2002, the "Platinum Event for the Workforce System," only one session has to do with persons with disabilities. The next major conference must include more sessions on disabilities.
 - The Workforce Excellence Network's recent publication, *Performance Excellence in One-Stop Career Center Operations*, contains little mention of accessibility issues. The

Office of Disability Employment Policy (ODEP) should review DOL-funded guides for Workforce Boards to ensure that they reflect accessibility goals.

Consumer/Customer Organization

Access to the Three WIA Service Levels

- Provide alternatives to self-service for WIA core services, especially for people not accustomed to using computers. *Rehabilitation Research and Training Center*
- WIA needs stronger language stating that universality applies to all three levels of service. People with disabilities do not know that they can access Individual Training Accounts (ITAs) and are not identified as needing training-level services. The bottom line is that until persons with disabilities use the same training resources as the general population, there will continue to be increasing federal allocations for a separate disability employment system. *Rehabilitation Research and Training Center*
- Under the Americans with Disabilities Act (ADA), core services available to the general public in One-Stops must be available to persons with disabilities, including initial assessment, counseling, and follow-up. *Professional Association*

Over-reliance on Vocational Rehabilitation (VR)

- Staff tends to automatically refer any person with a disability to VR, bypassing all other options in the career centers. *Consumer/Customer Organization*
- One-Stops are not equipped to serve persons with disabilities who do not choose to go to VR. We need to look at all accessibility barriers and all types of disabilities that are less apparent, like mental illness. Preconceptions about a person's ability are the greatest barrier to employment. *Consumer/Customer Organization; Disability Service Provider*
- There are significant numbers of persons with disabilities who could benefit from One-Stop access without VR involvement. Staff must have the knowledge and skills to direct these customers to the appropriate array of services. *One-Stop Partner: Vocational Rehabilitation*

2.4 Staff

- The more difficult part of accessibility is opening the minds of staff to address: "How do I serve people who are different than me?" The Work Incentive Grant funded sensitivity training and ADA training for our staff, providers, and employers. *One-Stop Center Staff*
- Of equal importance [to ADA compliance] is the availability of and access to qualified staff who fully appreciate and respect the multiple challenges to employment encountered by persons with disabilities, especially those with significant disabilities. *One-Stop Partner: Vocational Rehabilitation*

- One-Stop staff sensitivity training in my state didn't work the first time and had to be redone. *Consumer/Customer Organization*

2.5 Accessibility Issues Regarding Specific Disabilities, Populations, or Services

- We haven't found much evidence that the system is operating in conformity with Congress' intent for serving persons who are blind or visually impaired. *Consumer/Customer Organization*
- Few One-Stop centers offer assistive technology for the blind. Only one center surveyed had a staff person trained as a sighted guide. *Consumer/Customer Organization*
- Through the ETA and ODEP, the Department of Labor should explore access to personal assistance services through One-Stops. *National Association: Disability Service Providers*
- Change One-Stop evaluation tools to more accurately assess people with literacy problems and ensure that the tools are not culturally offensive but address cultural and ethnic issues as well as the needs of persons with the most significant disabilities. *Rehabilitation Research and Training Center*
- Persons with mental illness have the highest unemployment rates and some of the greatest barriers to accessing One-Stop services, especially intensive and training services. *Consumer/Customer Organization; Disability Service Provider*
- Expand language within Section 167 of WIA to mandate services for eligible migrant and seasonal farmworkers with disabilities. *One-Stop Partner: Migrant and Seasonal Farmworker Programs*

2.6 Customer Rights

- We are concerned about meeting people's different needs, regardless of what disability they have, on a person-by-person basis. One size does not fit all. Every new thing to come down the pike helps some, but not all people. *National Association: Disability Service Providers*
- WIA must promote informed choice for individuals with disabilities in all of its programs. *National Association: Disability Service Providers*
- Protecting a client's rights in the writing of the individual employment plan and the provision of case management is critical. *Professional Association*
- I don't believe WIA protects the rights of individuals who are not served by VR. VR has a hearing/grievance process for clients who have a disagreement with a service provider. This

protection—an objective third-party remedy for consumers—does not exist in WIA, but it should. *Client Assistance Program (CAP) / Protection and Advocacy System (P&A)*

2.7 “Best Practices” in Accessibility

- Work Incentive Grants are doing a tremendous job of changing attitudes. We encourage you to expand these grants and use what you have learned from them to create stronger instructions to states around including persons with high support needs in One-Stops. *National Association: Consumers/Customers and Disability Service Providers*
- Concepts of accessibility and customization from the Work Incentives Grants should be incorporated throughout the WIA system. *National Association: State Government Agencies*
- There are exemplary individual practices within the One-Stop system, but there is little evidence that these practices are integrated into the system. *Consumer/Customer Organization*

2.8 Resources for Accessibility

- There is not enough money appropriated for meeting accessibility needs beyond meeting minimal ADA requirements. The Work Incentive Grant will help us to meet further accessibility needs, but we are concerned about sustainability. *Disability Service Provider*
- WIA should include funds for training and technical assistance that ensure access for persons with disabilities. Many job centers lack the physical and programmatic accessibility mandated by the Americans with Disabilities Act. *State One-Stop Partner: Vocational Education*
- Provide sufficient funding and technical assistance for One-Stops to make all their programs accessible. *Disability Service Provider*
- WIA should define a role for VR agencies and Independent Living Councils to provide technical assistance on One-Stop accessibility. *State One-Stop Partner: Vocational Education*

2.9 Workplace Accessibility

- We found our Work Incentive Grant funds useful to work with employers around ADA issues such as fear, sensitivity, and assistive technology. *One-Stop Center Staff*

3. Service Coordination

Services to persons with disabilities require coordination among multiple partners within and outside of the One-Stop system. This section summarizes forum comments related to the coordination of services for job seekers with disabilities. The comments are clustered by topic as follows:

- General Comments on Coordination
- Role of Vocational Rehabilitation
- Other Disability Programs and Organizations
- Program Consolidation
- Business Partnerships
- Funding
- Co-Location
- Other Coordination Topics

3.1 General Comments on Coordination

- Coordination is critical. *Local Workforce Investment Board Member and One-Stop Partner: Vocational Rehabilitation*
- For integration to happen, you need to lay the groundwork and formalize the process. Work Incentive Grant funds have enabled our front-line staff to provide high-touch services in a low-touch system. We have made purposeful links with TANF, public housing, drug courts, youth-in-transition classrooms, and dislocated workers. *One-Stop Center Staff*
- Partnership is not working as well as it should be. *Consumer/Customer Organization*

3.2 Role of Vocational Rehabilitation (VR)

- We strongly believe in the dignity of work and the power of partnerships that recognize and respect VR programs' integrity. *One-Stop Partner: Vocational Rehabilitation*
- Disability councils can provide assistance to One-Stops, but VR, the most under-funded job placement and training system, cannot be expected to pay for all these accommodations if individuals with disabilities are to access generic workforce system services in a meaningful way. *One-Stop Partner: Vocational Rehabilitation*
- I commend the efforts to provide equal access to everyone, but the fundamental problem in disability is not accessibility. As a young blind person, I didn't believe in myself. I didn't think I could get a job except at a sheltered workshop somewhere. It takes a very intensive, specifically targeted program like VR to address the needs of that person. We shouldn't expect generic employment and training system to address those needs. *Consumer/Customer Organization*

- Some individuals, by the nature of their disabilities, need access to qualified personnel, individual assessment, and customized supports such as those that make VR a unique One-Stop partner. *One-Stop Partner: Vocational Rehabilitation*
- Pennsylvania's VR system uses an order of selection that allows it to serve only persons with the most significant disabilities. This provides unique challenges to persons attempting to use CareerLink centers. *Consumer/Customer Organization*
- You need to single-source or keep siloed the money for rehabilitation so that the rest of the agencies can return the same numbers we have. My state's VR works. They've developed an effective service delivery system that returns \$10 on every \$1 spent. In 2001, VR successfully rehabilitated 11,989 persons and placed 93 of them in competitive employment. That's people with the most significant disabilities, competing with people who are not disabled. The weekly earnings of VR customers were \$810,877 before rehabilitation and \$3,431,821 after rehabilitation. During 2001, VR consumers placed in employment paid estimated taxes of \$36,398,200. *Consumer/Customer Organization*
- The current lack of One-Stop language within the Rehabilitation Act impacts the administration and supervisors and simply drops the VR system into the One-Stop system. While we have seen co-location taking place, the lack of service flexibility has presented challenges to integration and resulted in what appears to be a dual service environment: highly rich services for VR customers and a distinctly lesser level of service for non-VR customers with disabilities. WIA should include statutory language and additional resources that would allow expanded engagement of VR staff in One-Stop activities beyond co-location, such as through shared intake and case management systems and employment plans. *State One-Stop Partner: Vocational Education*
- Look at the impact of mandatory partnerships on service provision. VR order of selection policies put people with hearing loss, a very common disability, at the bottom of the list. Hearing loss is the most common identified birth defect and affects 1 out of 10 people under age 65. Hearing loss later in life can be very socially and psychologically isolating. Many people who experience it do not know what to do about their impaired ability to communicate, or that VR could help them. There needs to be more outreach in this matter. *Consumer/Customer Organization*

3.3 Other Disability Programs and Organizations

- Adding other state disability-specific programs as partners in the One-Stop system to better serve individuals with disabilities should be explored. *National Association: Disability Service Providers*
- Co-locate non-profit and for-profit disability employment service providers, not just state VR agencies, in One-Stops and recognize them as full WIA partners. *Rehabilitation Research and Training Center*

- The One-Stop Service System should collaborate with Ticket to Work program under the Social Security Administration. *Rehabilitation Research and Training Center*
- Enhance efforts to work together with [Rehabilitation Act] Section 304 [farmworker rehabilitation] projects on the development, implementation and expansion of employment and training activities. *One-Stop Partner: Migrant and Seasonal Farmworker Programs*
- Use consumer and disability rights organizations as resources for talking to people about disabilities. *Consumer/Customer Organization*
- One-Stops do work when you give opportunity for community-based disability organizations to co-locate. *Disability Service Provider*

3.4 Program Consolidation

- Combining disability-specific programs into the generic employment and training system adds administrative complexity, diverts funds from needed services, and decreases program accountability and potential. I hope we will find a better way to do this in WIA reauthorization. It was a mistake in the past to not have linkages, which led to a lack of accessibility. But the generic employment and training system understands disability as primarily an accessibility problem, since that is the most apparent issue that any system should be able to address. *Consumer/Customer Organization*
- I think we should end the fiction caused by mandatory partner language. We should continue to hold the employment and training system to the expectation to improve accessibility, but let programs do what they can best do separately for themselves. *Consumer/Customer Organization*
- Coordination does not mean consolidation. Many have hypothesized that RSA and its discussion of autonomy means that VR must be isolated. What coordination means is the recognition among all the agencies involved of what their expertise is, how to best deliver it, and that each agency has a dedicated and often limited budget to do their job. Coordination means compromise, cost sharing, cross training, information sharing, and even some creative, inter-agency demonstration projects. *Local Workforce Investment Board Member and One-Stop Partner: Vocational Rehabilitation*
- While ANCOR supports mandatory collaboration, that doesn't mean consolidation. Collaboration requirements don't adequately address the need for comprehensive assessment of all services under WIA. *National Association: Disability Service Providers*

3.5 Business Partnerships

- Many of our members receive funding from Projects With Industry (PWI)* grants from the Department of Education, as well as support from ETA programs. 2500 businesses are affiliated with our members. In a recent, informal survey, most of our members said they have or are trying to establish relationships with One-Stops. The positive relationships found in the survey came from Projects With Industry programs. In the past, ETA funded several organizations using the PWI model, using a business partnership model consistent with WIA and strict performance standards. *One-Stop Partner: Projects With Industry (RSA)*
- Include the Projects With Industry (PWI) model in more services—it really works. Our PWI grants can't serve everyone who needs services. *Disability Service Provider*
- Consistently seek ways to enhance public and private partnerships. WIA both requires and encourages these types of partnerships. Social Security is investing in partnerships through its Employment Networks and working with local service providers. But [the] Rehabilitation [Services Administration] is inconsistent with this, decreasing its partnerships with the private sector over decades. *Disability Service Provider*

3.6 Funding

- Substantial funding increases are needed. Disability organizations are asking for a slice of a shrinking pie, which is not well-received by many One-Stops. *One-Stop Partner: Projects With Industry (RSA)*
- The VR program must remain separate with dedicated funding under WIA. *National Association: Disability Service Providers*
- Include the concept of combined or blended funding to enhance the system's capacity to fully embrace supported employment. *National Association: State Government Agencies*
- The most significant reason reported for positive relationships between Projects With Industry (PWI) sites and One-Stop Centers was that PWI services are funded by a grant from

* The Projects with Industry (PWI) Program creates and expands job and career opportunities for individuals with disabilities in the competitive labor market by engaging the participation of business and industry in the rehabilitation process. PWI projects promote the involvement of business and private industry through Business Advisory Councils (BAC) that identify jobs and careers available in the community and provide advice on appropriate skills and training. This program provides job development, job placement and, to the extent appropriate, training services to assist individuals with disabilities to obtain or advance in employment in the competitive labor market. PWI grants are made to a variety of agencies and organizations, including business and industrial corporations, community rehabilitation programs, labor organizations, trade associations, and foundations. (Source: <http://www.ed.gov/offices/OSERS/RSA/Programs/Discretionary/pwi.html>)

RSA, so there is no cost to the One-Stop Center. *One-Stop Partner: Projects With Industry (RSA)*

- Many partners who are co-located have silo funding with restrictions on how the money can be spent. Workforce Incentive Grants and Projects With Industry are semi-permeable, so their clients can qualify for other funding sources. We try to serve people with disabilities with all our funding sources. *Disability Service Provider*

3.7 Co-Location

- Co-location in One-Stops is expensive: we have to pay rent with funds that could go to providing services. Some One-Stops let us co-locate for free. *Disability Service Provider*
- Full-time co-location in One-Stops is the best model I have seen. *Disability Service Provider*
- Many of our members who reported positive relationships with One-Stops were co-located in the One-Stop Center, which was an important means for One-Stops to offer services to persons with disabilities. *One-Stop Partner: Projects With Industry (RSA)*

3.8 Other Coordination Topics

Benefits Counseling

- People with disabilities need accurate, timely information on work incentives and public benefits in order to leave the public assistance rolls and increase their employment. One-Stop Centers are the logical place to provide this expertise. Access to benefits planning should be available to all who need it, not just SSI and SSDI beneficiaries. WIA reauthorization should define benefits planning as an intensive-level One-Stop service, as does the Ticket to Work and Work Incentives Improvement Act. *Rehabilitation Research and Training Center*
- Provide focus and resources to include effective benefits counseling within the One-Stop system. *State One-Stop Partner: Vocational Education*

TANF

- I haven't heard one word about TANF recipients [at this forum]. About 40% of the people still on TANF have disabilities. We need to consider that group as well. *Consumer/Customer Organization*
- In trying to reach hard-to-serve customers, you have to go out to meet their needs. Our Work Incentive Grant allows VR staff to conduct outreach to TANF clients. This has staff front-loaded to catch people as they enter system and co-enroll them in more than one program. *One-Stop Center Staff*

Federal-Level Coordination

- Coordination of services must start at the top among RSA, ETA, and HHS. It must be demonstrated and made public to set an example for states and locals, so that WIBs and Rehabilitation Councils can work successfully together. *Local Workforce Investment Board Member and One-Stop Partner: Vocational Rehabilitation*
- WIA should encourage collaborations between ED and DOL in assisting states. *State One-Stop Partner: Vocational Education*

Referrals

- People working in the system do not always know where to send customers. *Consumer/Customer Organization*

Memoranda of Understanding (MOUs)

- People we've talked to say that Memoranda of Understanding (MOUs) about accessibility are toothless. Enforcing MOUs is important. Partners don't deliver as many things as they should (money, space, etc.) *Disability Service Provider*

4. Provision of Training Services

Attendees at this forum raised issues about the quantity and quality of training services available for individuals with disabilities. This section summarizes these comments, which are grouped under the following topics:

- Access to and Resources for Training
- Trainer Qualifications
- Entrepreneurship Training

4.1 Access to and Resources for Training

- In the April 17 WIA forum, a recurring theme was the difficulty of getting past the core services level and the lack of front-line staff knowledge about career ladders, not just entry-level jobs. There needs to be less emphasis on physical facilities and infrastructure and more resources devoted to intensive services and skills training. *One-Stop Partner: Vocational Rehabilitation*
- Training is not there, especially for people who are not entry-level. *Consumer/Customer Organization*

- Training must be emphasized for individuals with disabilities in order to ensure successful employment. Adequate resources must be made available for training. *National Association: Disability Service Providers*
- People using the One-Stop centers do not know that the Individual Training Accounts (ITAs) are an option for paying for desired training, and will therefore not use the ITAs and will not be represented in the database as people who need and use training level services. *Rehabilitation Research and Training Center*

4.2 Trainer Qualifications

- Many trainers do not know how to modify their curriculum, materials or presentations to accommodate persons with disabilities. Some trainers are unfamiliar with basic provisions of [Rehabilitation Act] Section 504 and the Americans with Disabilities Act. We recommend better trainer screening, professional development, and skills evaluation. *Professional Association*
- We need to increase personnel and training. Many Vocational Rehabilitation trainers do not recognize hearing loss as a real disability and stereotype it as an aging issue. Trainers are often unaware of available services and assistive technology. *Consumer/Customer Organization*

4.3 Entrepreneurship Training

- The last Rehabilitation Act reauthorization dropped the proposed entrepreneurship provisions. Some state VR agencies (such as Ohio and Montana) have succeeded in helping clients establish small businesses. *Consumer/Customer Organization*
- Successful entrepreneurship requires guidance, training, and counseling. *Consumer/Customer Organization*
- We want to see evaluations of small businesses started by persons with disabilities. *Consumer/Customer Organization*
- Involve the Small Business Administration in these discussions. *Consumer/Customer Organization*

5. Performance Measurement

This section summarizes participants' comments on the impact of WIA performance measures on customers with disabilities. The comments are clustered by topic as follows:

- General Comments on Performance Accountability
- Removing Disincentives to Serving Persons with Disabilities
- Which Performance Measures to Include
- Accuracy and Consistency of Data
- Other Issues Regarding Performance Measurement

5.1 General Comments on Performance Accountability

- We need quality service provision, accountability for outcomes, and adequate funds for the system. *One-Stop Partner: Vocational Rehabilitation*
- Accountability is a major issue. We need to make sure the dollars are used wisely in the way they were intended to be used, to obtain a good return on investment. *Consumer/Customer Organization*

5.2 Removing Disincentives to Serving Persons with Disabilities

- Incentives need to be provided for One-Stop centers to serve persons with disabilities. *One-Stop Partner: Projects With Industry (RSA)*
- We need separate performance measures for persons with disabilities, to remove disincentives for One-Stops to serve them. DOL promised to put these measures in the WIA regulations over two years ago, but we still haven't seen them. *One-Stop Partner: Projects With Industry (RSA)*
- Align performance measures to prevent disincentives from serving persons with disabilities. *State One-Stop Partner: Vocational Education*
- There should be more responsive performance outcome measures for persons with high support needs. *National Association: Consumers/Customers and Disability Service Providers*
- Take care of outcome measures so that they don't discriminate against individuals with high support needs. *National Association: State Government Agencies*
- The outcomes system is an employer-as-customer system, which discourages serving people who are harder to employ. We need to create a subset or different set of outcomes for people with higher needs. *One-Stop Center Staff*

- One-Stops receive “incentive dollars” based on the numbers of persons seen, and this serves as a disincentive to staff to spend the additional time required by more complex situations. *Disability Service Provider*

5.3 Which Performance Measures to Include

- At the Rehabilitation Council, we try to get statistics on how many individuals with disabilities are receiving services, getting employed, and earning more than minimum wage. *Consumer/Customer Organization*
- Consistently measure employment outcomes by choice, wages, and benefits. VR discounts wages in its determination of what is a good job. *Disability Service Provider*
- We call on you to work toward a consistent definition of what is gainful employment and move forward better partnerships in working together, so that no individuals are discriminated against and they have equal opportunity and support from the VR system and the One-Stop career system. *Disability Service Provider*

5.4 Accuracy and Consistency of Data

- We need more accurate data on how many persons with disabilities are being served in the workforce investment system. I’ve heard 5%, but under JTPA it was 10%. We need to find out what happened here. *One-Stop Partner: Projects With Industry (RSA)*
- It is difficult for service providers to see exactly what they’re doing. No two systems report their numbers the same way. *Consumer/Customer Organization*

5.5 Other Issues Regarding Performance Measurement

- ***Administrative and Reporting Burden:*** Community providers working with One-Stops to provide training must not be burdened with extensive administrative and reporting requirements that detract from providing services and supports, but change nothing about the overall outcome. *National Association: Disability Service Providers*
- ***Flexibility:*** Allow states flexibility to deal with local situations, such as high unemployment in rural areas. *Disability Service Provider*

6. Youth Activities

The Discussion Guide on One-Stop Services to Persons with Disabilities requests input on WIA youth activities related to youth with disabilities. Forum participants also commented on youth services outside of WIA Title I. This section is organized by youth topic as follows:

- Youth Program Accessibility
- Youth Transition Services
- Youth Councils
- Youth Leadership

6.1 Youth Program Accessibility

- Clarify that youth with disabilities should be served by youth programs. *Rehabilitation Research and Training Center*
- Ensure that programs are accessible to all, instead of the notion that accommodations are just for persons with physical disabilities. *Consumer/Customer Organization*
- Expand summer youth employment programs to include youth with disabilities who, due to Individual Employment Plan (IEP) services and goals, cannot fully participate in One-Stop youth programs during the year. *Rehabilitation Research and Training Center*
- Increase collaborations between school systems and One-Stops regarding job training and placement. *Rehabilitation Research and Training Center*
- **Youth Information Centers:** Establish Youth Information Centers in each state that are youth-led to provide information about available services and technical assistance to youths. We envision a cross-agency effort where all the needs of youth with disabilities can be met at one location. *Consumer/Customer Organization*

6.2 Youth Transition Services

- You need to work on transition systems (school-to-work, work-to-school, training-to-work, and work-to-work). *Consumer/Customer Organization*
- In the discussion of youth transition, I'm wondering where is OVAE [U.S. Department of Education, Office of Vocational and Adult Education]? They need to be sensitized to how to accommodate young persons and adults with disabilities. *Consumer/Customer Organization*
- Youth with disabilities continually fall between the cracks in terms of post-secondary education. *Consumer/Customer Organization*
- Integrate WIA youth programs into youth transition plans. *Consumer/Customer Organization*

- Use Youth Information Centers to develop processes to identify, evaluate, and allocate resources needed for each individual transitioning from high school to college, college to work, work to college, etc. *Consumer/Customer Organization*
- Benefits planning needs to come in before youth age out of the system. Many youth with disabilities reach age 18 or 19 with no clue that they will lose their benefits or about how to get a job. *Consumer/Customer Organization*

6.3 Youth Councils

- Youth Councils lack representation from youth with disabilities. Why should non-disabled people advise disability policy without including the people it affects? *Consumer/Customer Organization*
- Strengthen Youth Councils by including youth members, both with and without disabilities. *Rehabilitation Research and Training Center*
- Youth Councils should be viewed as a cross-agency opportunity for state and local agencies to hear from the people they represent. It's powerful to see what youths can do when you put them together. *Consumer/Customer Organization*

6.4 Youth Leadership

- Focus on youth leadership. Youths get tired of adults talking down to them all day and it takes other youth to motivate them to make a positive change. Maximize the notion of choice, empowerment, and self-sufficiency. *Consumer/Customer Organization*
- Employ youths with disabilities to provide positive role models and empowerment for other youths with disabilities. *Consumer/Customer Organization*
- WIA should assist with providing mentors to youth. *Consumer/Customer Organization*

7. Support for or Recommended Changes to Specific Programs

Many forum participants commented on specific programs and in relation to persons with disabilities, including some programs that are not mandatory WIA partners and are authorized by laws other than WIA. Most of these program-specific comments either expressed support for the program or recommended changes to the program. These comments are organized by agency or program as follows:

- Ticket to Work
- Medicaid

- Medicare
- Special Education / Individuals with Disabilities Education Act (IDEA)
- Rehabilitation Services Administration (RSA) Programs and Issues

7.1 Ticket to Work

- WIA must require RSA, SSA and DOL to work cooperatively to ensure effective implementation of the Ticket to Work Program across the nation, as well as provide effective outreach to those eligible for receiving Tickets and potential Employment Networks (ENs) about the program. *National Association: Disability Service Providers*
- We urge RSA, SSA, and DOL to work together to provide start-up funding for community employment providers serving as ENs under the Ticket to Work Program. *National Association: Disability Service Providers*
- While Social Security has made significant progress in reducing the disincentives to work, the essential problem of “falling off the cliff” still exists and discourages work, especially full-time work. *Disability Service Provider*
- SSA should make Ticket to Work available to transitioning youth without forcing them to lose a ticket as adults. *National Association: Consumers/Customers and Disability Service Providers*
- Fix Ticket to Work to be useful for persons with high support needs. *National Association: Consumers/Customers and Disability Service Providers*
- Ticket to Work has unfulfilled promise until payments support individuals with high-support needs. We urge SSA to support individual milestone payments. *National Association: State Government Agencies*

7.2 Medicaid

- SSA’s Medicaid buy-in program is great and saves me a lot in health plan co-payments. But also look at assisting employers who pay higher health insurance for employees with disabilities, who have higher rates than their co-workers. *Consumer/Customer Organization*
- Medicaid waiver funds are a major source of support for persons with disabilities, but they have a strong bias in favor of segregated settings. We strongly urge CMS to take the lead of RSA, which redefined its employment outcomes to favor integrated settings. *National Association: Consumers/Customers and Disability Service Providers*

- Apply Olmstead[∇] principles to Medicaid waivers. Medicaid funding is a significant contributor to success in supported employment, but the trend among states is to support segregated workplaces. Strong leadership and increased access to Medicaid funds for ongoing work will help individuals choose to participate in the workforce. *National Association: State Government Agencies*

7.3 Medicare

- We would love to see training of Vision Rehabilitation personnel included in the provision of Medicare services for people who are blind or visually impaired. *Disability Service Provider*

7.4 Special Education / Individuals with Disabilities Education Act (IDEA)

- Reauthorization of the Individuals with Disabilities Education Act (IDEA) must strengthen transition services for students with disabilities who do not plan to pursue higher education. *National Association: Consumers/Customers and Disability Service Providers*
- Supported employment needs to be included as an option for transitioning youth. Anecdotally, schools don't put supported employment in transition plans because they fear bearing the costs of supports. *National Association: Consumers/Customers and Disability Service Providers*

7.5 Rehabilitation Services Administration (RSA) Programs and Issues

- Title I consolidation of Department of Education programs like Projects With Industry (PWI), farmworker disability, etc. would be a big mistake. *National Association: Consumers/Customers and Disability Service Providers*
- Positive relationships [between One-Stop Centers and many disability service providers] will end if the President's budget passes, which eliminates RSA's Projects With Industry, supported employment grants, and migrant farmworker programs. The Administration's assumption seems to be that states will automatically pay for programs that lose federal funds and that they duplicate VR. But in fact they are very different. *One-Stop Partner: Projects With Industry (RSA)*

Migrant & Seasonal Farmworker Programs (Rehabilitation Act Section 304)

- It would appear that the recommended cuts (according to the FY 2002 budget submitted to Congress) have far more to do with paring down the budget, than with appropriately

[∇] In *Olmstead v. L.C.*, (1999), the U.S. Supreme Court ruled that Title II of the Americans with Disabilities Act and its regulations require States to administer their services, programs, and activities "in the most integrated setting appropriate to the needs of qualified individuals with disabilities." (Source: <http://www.cms.hhs.gov/olmstead/>)

and adequately serving disabled migrant and seasonal farmworkers. The proposed FY 2003 budget places an estimated 750,000 disabled migrant and seasonal farmworkers and their families at extreme risk. The human cost for not increasing funds is incalculable for both disabled consumers and their families. *One-Stop Partner: Migrant and Seasonal Farmworker Programs*

- We encourage you to not only continue funding Section 304, but to increase it to at least \$5 million for FY 2003. Despite the documented success of Section 304 projects, a number of states continue to have no projects. As a result, potentially fewer than one percent of disabled consumers are served annually. *One-Stop Partner: Migrant and Seasonal Farmworker Programs*

Projects With Industry

- PWI serves as model for WIA in including persons with disabilities in One-Stops via business partnerships. This model combines specific expertise in the disability issues and knowledge of business practices. PWI is also very cost-effective, with an average cost per placement of \$1700. *One-Stop Partner: Projects With Industry (RSA)*

Non-profit businesses that employ persons with disabilities

- RSA officially narrowed its definition of employment outcomes to exclude many of our workplaces [that provide jobs through National Industries for the Blind] in October 2001. RSA is saying these are not integrated settings because too many persons with disabilities work there and there is no comparable setting in the community. These decisions are made without officials visiting our workplaces or looking at what is comparable in the community. *Disability Service Provider*

8. Other Topics

Several topics not included in the Discussion Guide on One-Stop Services to Persons with Disabilities attracted numerous comments from forum participants. These additional topics are the following:

- WIA Implementation
- Funding
- Job Placements
- Staff Qualifications

8.1 WIA Implementation

- Our major concern is in the implementation of WIA. It appears to work fairly well given the system's diversity. It is in the execution that we find major problems. *Consumer/Customer Organization*

- I challenge each of us to visit One-Stop centers randomly and use the system that we are setting up for others, and let our conscience be our guide. *One-Stop Partner: Vocational Rehabilitation*

8.2 Funding

- WIA's full implementation and success require increased financial support from the federal government. *Professional Association*
- Take into account the growing disability population and provide adequate appropriations that will enable adequate services to be provided. *State One-Stop Partner: Vocational Education*

8.3 Job Placements

Job Quality

- We have to provide better-quality jobs in the system, and tell employers that persons with disabilities can and do work well. *Consumer/Customer Organization*
- We need to give persons with disabilities a voice in the system, and find a way to make more jobs and better jobs accessible. Most job listings in Career Link today are in manual labor and telemarketing. *Consumer/Customer Organization*

Integrated Versus Segregated Settings

- There are significant barriers to employment of persons with high support needs. There are 500,000-1,000,000 individuals still in segregated settings who could benefit from being in an integrated system. Between 80% and 90% of federal funds still go to segregated settings, despite policies that on paper embrace independence, self-determination, meaningful careers, and full inclusion in the mainstream. We need strong federal leadership to ensure that these phrases have real meaning. *National Association: Consumers/Customers and Disability Service Providers*

8.4 Staff Qualifications

- Not part of my written statement, but crucial to reauthorization, is the workforce crisis—the lack of an adequately paid and trained stable workforce to provide services in the disability field. There needs to be consideration of the fact that without federal leadership, we can't solve the problem. This leads to order of selection policies and waiting lists. We need to do better than 70% of persons with disabilities working. *National Association: Disability Service Providers*

- We need to improve access to and qualification of all service providers, not just training providers. *Professional Association*
- The Rehabilitation Act requires Vocational Rehabilitation (VR) counselors to possess the appropriate expertise and academic preparation necessary to serve persons with disabilities. Research has proven a clear relationship between VR counselors' education levels and improved employment outcomes for clients. However, WIA set no minimum qualifications for service providers and case managers. Substandard assessments and services by ill-prepared staff are the norm in One-Stops. *Professional Association*
- We recommend including language regarding employment and career counseling practices, including testing requirements, in the WIA reauthorization. Inappropriate and inaccurate testing methods impact persons with disabilities' access to necessary services and further thwart informed choice. At a minimum, we recommend that WIA reauthorization address the qualifications of professional counselors and case managers to ensure accountability and protect consumers. *Professional Association*
- If we could change one thing about WIA, it would be that all persons served by the program would have access to the services of a properly trained and qualified provider to meet their individual needs. *Professional Association*
- When I hear concerns about credentialing before working in certain fields, I get nervous. Some of most creative people I know are not college educated. We must find ways to encourage creativity in helping people find jobs. It helps to have a masters or bachelors degree, but we need to find ways to harness the creativity of people who don't have degrees. *National Association: Disability Service Providers*
- The best services we can provide with Federal dollars to persons with disabilities, and all persons served via WIA, come from qualified providers. Tests such as DSM-IV and Myers-Briggs, medical reports, assessments, and thorough employment plans that take into account a person's complete needs are part of the everyday world of case managers. Research proves the importance of staff qualifications, and it shows in the differences in outcomes provided by qualified VR staff versus WIA staff. *Professional Association*
- What we don't have is good training. Even if you have creativity and good instincts, these are complex issues we deal with, and we have a dearth of training for front-line WIA staff. Training is very important but the infrastructure is not there. *National Association: Consumers/Customers and Disability Service Providers*
- **Resources for staff training:** The DOL/ETA should make available targeted grant funds – including WIA grants – for collaborations with community providers and educators to develop direct support apprenticeship programs. *National Association: Disability Service Providers*